



IMCO® **RECYCLING of IDAHO INC.**

January 10, 2007

Air Quality Program Office
Attn: Mr. Bill Rogers
Department of Environmental Quality
1410 North Hilton
Boise, Idaho 38706-1255

Re: Permit to Construct Application for IMCO Recycling of Idaho, Inc.,
Facility ID No. 055-00031

Dear Mr. Rogers:

Attached is a permit to construction application for our IMCO Recycling of Idaho, Inc. facility ("facility") in Post Falls, Idaho. Also attached is a check to the Idaho Department of Environmental Quality in the amount of one thousand dollars (\$1,000) for payment of the associated permit application fee.

The facility currently has a permit to construct (No. 055-00031) issued on June 4, 2002 that includes the following operating sources:

1. Scrap Receiving and Hauling to Storage
2. Scrap Preparation and Associated Handling
3. Scrap Melting in Furnace No. 1 and Associated Handling
4. Scrap Melting in Furnace No. 2 and Associated Handling
5. Dross Receiving and Associated Handling to Storage
6. Rotary Furnaces No. 1 and No.2, and Associated Handling
7. Holding Furnace and Associated Handling
8. Saltcake Cooling Process and Associated Handling

The facility has discontinued the use of the following sources and associated equipment, and is requesting that these sources and associated equipment be removed from the permit to construct:

1. Scrap Preparation and Associated Handling
2. Scrap Melting in Furnace No. 1 and Associated Handling
3. Scrap Melting in Furnace No. 2 and Associated Handling
4. Holding Furnace and Associated Handling

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Department of Environmental Quality
State Air Program

A Subsidiary of IMCO RECYCLING INC.

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In addition, the dross cooler associated with the "Saltcake Cooling Process and Associated Handling" operating source has been removed from the facility. However, saltcake staging operations continue to be performed at this source, and the associated baghouse and corresponding stack continue to control emissions from this operation. As a consequence, we are requesting that the "Saltcake Cooling Process and Associated Handling" operating source be renamed to "Saltcake Staging and Associated Handling". No changes have been made to the associated baghouse and corresponding stack. We also request that the allowable particulate emissions associated with "Saltcake Staging and Associated Handling" source be the same as that established for the "Saltcake Cooling Process and Associated Handling" source.

Attachment No. 1 provides a summary of the facility's proposed changes to its current permitted emission limits. Net allowable emission reductions across all pollutants are substantial. We are, however, requesting a slight increase in VOC emissions from the "Rotary Furnace Baghouse". The current permit to construct limits these emissions to: 1.60 lb/hr and 7.01 T/yr. We would like permit limits established at: 3.60 lb/hr and 15.77 T/yr.

We are also requesting a few changes to the permit conditions on the facility's remaining operating sources. Condition No. 6.18 of the current permit to construct for the "Rotary Furnaces No. 1 and 2, and Associated Handling" source requires the operation of an opacity monitor in Stack No. 6 (i.e., the baghouse exhaust stack). This emission source is also governed by the Secondary Aluminum NESHAP requirements of 40 CFR Part 63, Subpart RRR. Specifically, 40 CFR Parts 63.1506(m) and 63.1510(f) allow the operation of either a bag leak detection system or a continuous opacity monitoring system for a Group 1 furnace(s) with add-on air pollution control devices (e.g., baghouse). Stack No. 6 currently has both a bag leak system and an opacity monitoring system – which is redundant under the NESHAP. We, therefore, propose that Condition No. 6.18 be reworded to remove the requirement for an opacity monitor and add the requirement for a bag leak detection system.

Condition No. 6.8 in the current permit to construct establishes a fixed temperature limit (i.e., 275 °F) on the inlet to the rotary furnaces baghouse. Instead of this fixed limit, which can only be changed by submitting an application for permit modification, we propose that the language be reworded as indicated:

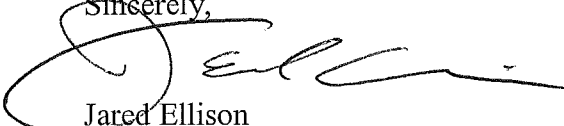
"The temperature of the gases entering the rotary furnaces baghouse shall not be greater than that established by a source test performed in accordance with 40 CFR Part 63, Subpart RRR, and documented in an Operation, Maintenance and Monitoring (OMM) Plan approved by the Department".

Since the "Holding Furnace and Associated Handling" operating source has been discontinued, we believe that all conditions in Section 7 of the current permit to construct should be voided. This includes Condition 7.7 that requires a roof-top opacity monitor. This monitor is an extreme safety hazard to operate and maintain during inclement weather. We believe that opacity from facility operations can best be addressed by trained visual observers.

Finally, recent discussions with Mr. Kevin Schilling of the Idaho Department of Environmental Quality indicate that the proposed changes addressed by our permit to construct application do not trigger air modeling requirements.

We appreciate the support provided by Idaho Department of Environmental Quality staff as we prepared the attached permit to construct application. If you have questions regarding this correspondence, please contact me at your convenience at the address indicated, or at the following telephone number: 208.773.1527.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jared Ellison', with a large, stylized initial 'J'.

Jared Ellison
Plant Manager

Attachments

cc: Dan Redline, IDEQ
Max Bertram, Aleris
James Buckert, Aleris
File